

Exhibit A

1 IN THE UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 SAN FRANCISCO DIVISION

4
5 IN RE: CATHODE RAY TUBE
6 (CRT) ANTITRUST LITIGATION

7 Master File No.
8 3:07-cv-05944 SC
9 MDL NO. 1917
10 Judge: Hon. Samuel Conti

11 VIDEOTAPED DEPOSITION OF JAMES MCCLAVE, Ph.D.

12 Taken on Behalf of the Defendant

13 DATE TAKEN: Wednesday, June 25, 2014

14 TIME: 9:00 a.m. - 1:50 p.m.

15 PLACE: Greenberg Traurig
16 450 South Orange Avenue
17 Orlando, Florida

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21 STENOGRAPHICALLY REPORTED BY:
22 NORA KELLY-MEOLA, RPR

23
24
25 Job No. 80760

1 APPEARANCES:

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5 ALSO PRESENT:

6 Jamie Hollingsworth, Videographer

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1 Q. So in your experience when you're looking at
2 price, it is common to use a log-log model of cost and
3 demand factors?

4 A. Yes. In my experience it's common.

5 MR. MCGINNIS: I don't have any other questions
6 for you. Thank you.

7 MR. TEMKO: I have no questions.

8 MS. BRASS: I have just a couple.

9 CROSS-EXAMINATION

10 BY MS. BRASS:

11 Q. Hello, Dr. McClave. I'm Rachel Brass. I'm
12 from Gibson, Dunn & Crutcher, the Chunghwa Picture Tube
13 defendants.

14 A. Hello.

15 Q. Hello. Just to make sure I understand your
16 report, do you attempt to offer an opinion on the
17 traceability of tubes sold by Chunghwa Pictures Tubes to
18 particular tube customers or to the plaintiffs for whom
19 you have submitted your report?

20 A. Did I understand you to ask about
21 traceability --

22 Q. Exactly.

23 A. -- following the tube?

24 Q. Yeah. Do you offer an opinion on that?

25 A. No.

1 Q. Okay. Do you know or did you study what
2 proportion of purchases made by any of the plaintiffs in
3 your report included Chunghwa Picture Tubes as tubes?

4 A. So make sure I understand it, the finished
5 products that purchased by plaintiffs, is that what
6 you're asking about?

7 Q. Uh-hum. Did you study what percentage of tubes
8 in the products they purchased were Chunghwa Pictures
9 Tubes tubes?

10 A. No.

11 MS. BRASS: Okay. I think those are all my
12 questions. Thank you.

13 THE WITNESS: Sure.

14 MR. LOUGHLIN: No questions.

15 MS. BRASS: Does anyone on the phone have any
16 questions?

17 MR. KESSLER: Does anyone on the phone have any
18 questions?

19 MR. MOORE: This is Paul Moore for one of the
20 defendants, we just have a couple of questions.

21 MR. KESSLER: You can go. Please proceed.

22 CROSS-EXAMINATION

23 BY MR. MOORE:

24 Q. Thank you. Dr. McClave, did you do anything to
25 evaluate the effects of differing levels of vertical

1 DEPONENT'S ERRATA SHEET AND SIGNATURE INSTRUCTIONS

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INSTRUCTIONS TO DEPONENT

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14

After reading this volume of your deposition,
indicate any corrections or changes to your testimony
and the reasons therefor on the Errata Sheet supplied to
you and sign it. DO NOT make marks or notations on the
transcript volume itself.

19

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*** REPLACE THIS PAGE OF THE TRANSCRIPT WITH THE
COMPLETED AND SIGNED ERRATA SHEET WHEN RECEIVED.

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1 ATTACH TO THE DEPOSITION OF JAMES MCCLAVE, Ph.D.
2 CASE: In re: CRT Antitrust litigation
2 CASE NO.: 3:07-cv-05944-SC

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4 ERRATA SHEET

5 I, JAMES MCCLAVE, Ph.D., have read the foregoing
6 deposition given by me on Wednesday, June 25, 2014, in
7 Orlando, Florida, and the following corrections, if any,
8 should be made in the transcript:

9 PAGE LINE CORRECTION AND REASON THEREFOR

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17 Subject to the above corrections, if any, my
18 testimony reads as given by me in the foregoing
19 deposition.

20 SIGNED at _____ Florida, this
21 _____ day of _____, 20____.

22 _____

23 JAMES MCCLAVE, Ph.D.

24

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1 CERTIFICATE OF REPORTER OATH

2

3 STATE OF FLORIDA

4 COUNTY OF POLK

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6 I, the undersigned authority, hereby certify

7 that the witness named herein personally appeared before

8 me and was duly sworn.

9

10 WITNESS my hand and official seal this 8th day

11 of July 2014.

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17 NORA KELLY-MEOLA, RPR, CLR

18 NOTARY PUBLIC - STATE OF FLORIDA

19 MY COMMISSION NO. FF 065827

20 EXPIRES: NOVEMBER 27, 2017

21 SCLAFANI WILLIAMS COURT REPORTERS, INC.

1 REPORTER'S DEPOSITION CERTIFICATE

2

3 STATE OF FLORIDA

4

COUNTY OF POLK

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6 I, Nora Kelly-Meola, Shorthand Reporter and
7 Notary Public in and for the State of Florida at large,
8 hereby certify that the witness appeared before me for
9 the taking of the foregoing deposition, and that I was
10 authorized to and did stenographically and
11 electronically report the deposition, and that the
12 transcript is a true and complete record of my
13 stenographic notes and recordings thereof.

14 I FURTHER CERTIFY that I am neither an attorney,
15 nor counsel for the parties to this cause, nor a
16 relative or employee of any attorney or party connected
17 with this litigation, nor am I financially interested in
18 the outcome of this action.

19 DATED THIS 8th day of July 2014 at Lakeland,
20 Polk County, Florida.

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Nora Kelly-Meola
SCLAFANI WILLIAMS COURT REPORTERS, INC.